



United States of America  
FEDERAL TRADE COMMISSION  
Washington, DC 20580

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June 21, 2021

**VIA ECF**

Hon. Louis L. Stanton, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: *FTC, et al. v. Quincy Bioscience Holding Co., Inc., et al.* (17-CV-00124-LLS)  
Proposed Stipulation to Extend Deadlines for Expert Discovery

Dear Judge Stanton:

Plaintiffs, the Federal Trade Commission and the People of the State of New York by Letitia James, Attorney General of the State of New York (“Plaintiffs”) and Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen Inc., Quincy Bioscience Manufacturing, LLC, and Mark Underwood (collectively, “Defendants”) (Plaintiffs and Defendants, collectively, “Parties”) hereby request that the Court enter the attached proposed stipulated order extending the deadlines for the Parties to exchange rebuttal expert reports and to complete expert discovery. As set forth in the proposed stipulated order, Plaintiffs submitted three initial expert reports, and Defendants submitted five initial expert reports. Plaintiffs need additional time to exchange rebuttal reports and to complete expert discovery due to the schedules of Plaintiffs’ experts and the large number of depositions that must be taken.

Respectfully,

*/s/Annette Soberats*  
Annette Soberats, Attorney  
Federal Trade Commission

cc: All parties via ECF